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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
STEVEN RAYMON WALLER,  
  
Defendant.

CASE NO. 2:23-CR-00122-DAD  
  
STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER  
  
DATE: March 5, 2024  
TIME: 9:30 a.m.  
COURT: Hon. Dale A. Drozd

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on March 5, 2024.
2. By this stipulation, defendant now moves to continue the status conference until April 9, 2024, and to exclude time between March 5, 2024, and April 9, 2024, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes approximately 23,000 pages of discovery including surveillance videos. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.
  - b) Counsel for defendant desires additional time to consult with her client, review

1 the current charges and discovery, to conduct investigation and research related to the charges,  
2 and to discuss potential resolutions with her client.

3 c) Counsel for defendant believes that failure to grant the above-requested  
4 continuance would deny him/her the reasonable time necessary for effective preparation, taking  
5 into account the exercise of due diligence.

6 d) The government does not object to the continuance.

7 e) Based on the above-stated findings, the ends of justice served by continuing the  
8 case as requested outweigh the interest of the public and the defendant in a trial within the  
9 original date prescribed by the Speedy Trial Act.

10 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
11 et seq., within which trial must commence, the time period of March 5, 2024 to April 9, 2024,  
12 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
13 because it results from a continuance granted by the Court at defendant's request on the basis of  
14 the Court's finding that the ends of justice served by taking such action outweigh the best interest  
15 of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: February 29, 2024

PHILLIP A. TALBERT  
United States Attorney

/s/ NICHOLAS M. FOGG  
NICHOLAS M. FOGG  
Assistant United States Attorney

Dated: February 29, 2024

/s/ NOA OREN  
NOA OREN  
Counsel for Defendant  
STEVEN RAYMON WALLER

**ORDER**

Pursuant to the stipulation of the parties and good cause appearing, the status conference previously scheduled for March 5, 2024 is hereby continued to April 9, 2024, at 9:30 a.m. and time is excluded between March 5, 2024, and April 9, 2024, under Local Code T4.

IT IS SO ORDERED.

Dated: February 29, 2024

Dale A. Drozd  
DALE A. DROZD  
UNITED STATES DISTRICT JUDGE